

South Dakota's Title I Allocations for SY 2009-10

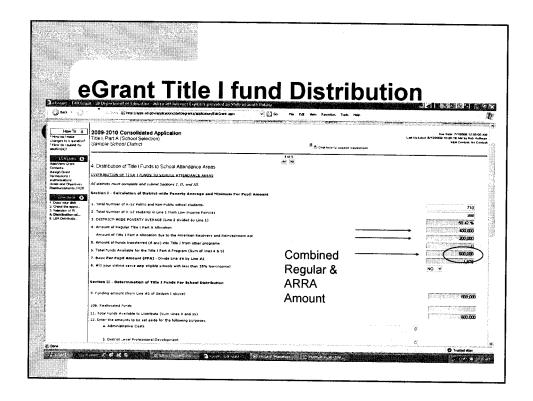
- Regular allocation \$43.7 million
- ARRA allocation \$34.7 million
- Total Combined Allocation \$78.4 million
 - Must reserve 4% (\$3.1 million) for School Improvement
 - Approximately \$400,000 for State Administration

District Level Allocations

- District Allocations
 - Primarily based on 2007 Census Bureau estimates for each District
 - Number School Aged (5-17) resident children living in families with incomes below the poverty line
 - Other factors
 - Foster Child Count
 - Children residing in Neglected Institutions
 - Percentage of formula children in the age group

Title I Allocations

- District receives two allocations from SD DOE
 - Regular Title I Part A
 - ARRA Title I Part A
- District must combine these allocations & sub allocate the funds to
 - Participating Schools, and
 - District-wide activities



District Distribution

- Reserve funds for District-wide Title I activities and requirements
- Distribute the remaining funds to participating Title I school attendance areas

District-Wide Reservations

- Administrative Costs
- School Improvement Related Public School Choice Transportation and Supplemental Services
- Parental Involvement 1% required if allocation \$500,00 or more
- District Level Professional Development

District Reservations Continued

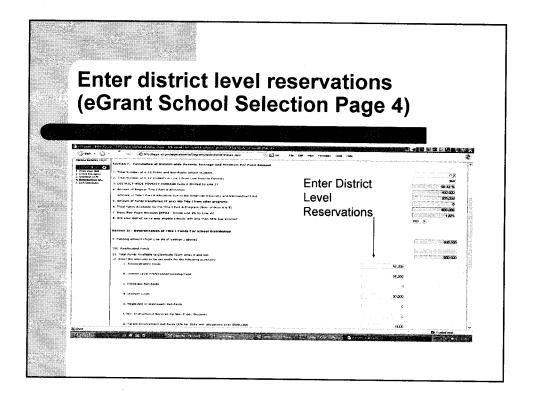
- Homeless
- District Level Title I Pre-school
- District Level Title I Summer school
- Non-Instructional costs for Private school students
- Other Instructional Activities please specify in application

Title I Required Set asides

- 1 % for parental involvement if Title I allocation over \$500,000
- An amount up to 20%, if needed, of the District's Title I Allocation if any of its schools are in improvement
 - supplemental educational services
 - public school choice.

Title I set aside at the School Level

- If a school is in level 1 or 2 improvement
 - 10% of individual school's allocation must be spent on professional development related to the reason it is in improvement status.
 - Must be able to document this requirement was met at the school level.

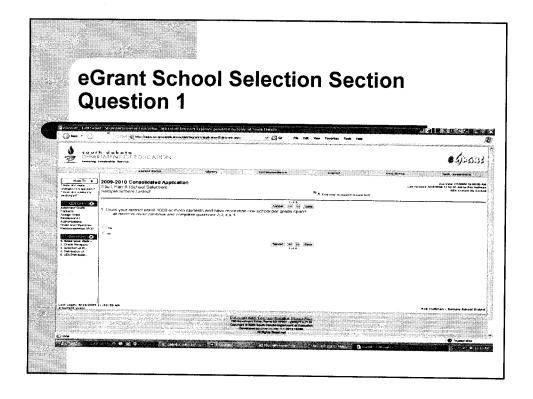


School Level Allocations

- Districts must allocate, budget, and track the expenditure of Title I funds down to the
 - school building level
 - District-wide activity level
- Make sure District business office if aware of this fund tracking requirements.

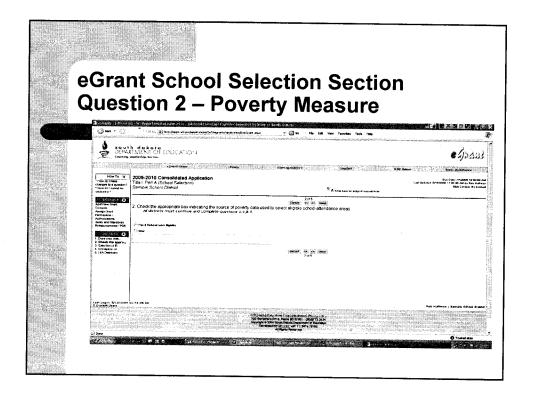
Eligibility Selection and Allocation Process Varies

- eGrant School Selection Section Question 1
- Small Districts
 - Less than 1000 students enrolled, or
 - Only one school per grade span
- Large Districts
 - 1000 or more students enrolled and multiple more than one school per grade span



Choose a poverty Measure

- eGrant School Selection Section Question 2
- The District must select a poverty measure
 - Free or reduced-price lunch (most common)
 - May choose a similar or other poverty measure
 - Contact SD DOE first if choosing another method

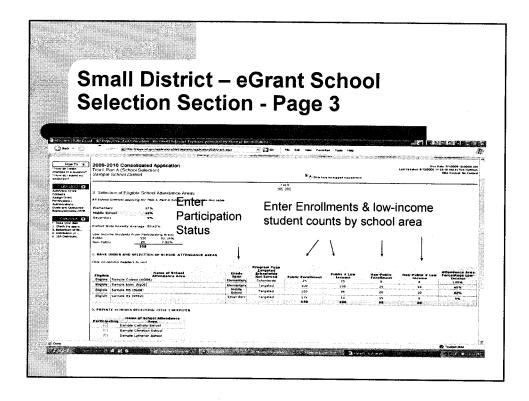


Small Districts

- Less than 1000 students enrolled, or
- Only one school per grade span
 - Do not have to rank schools attendance areas in order of poverty
 - No set allocation procedure in law

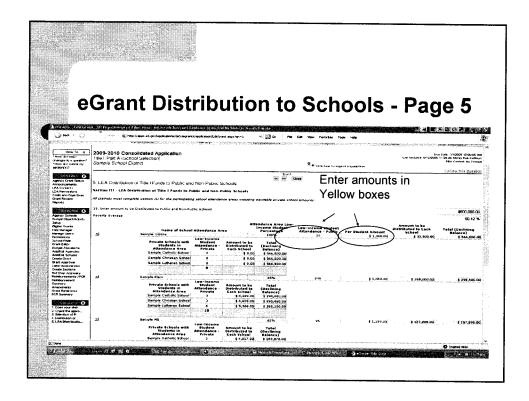
Small District School Selection (School Selection Section Question 3)

- Small District has discretion to select its participating Title I schools
- Enter enrollment and low-income counts for all schools
- Indicate program type for all schools generates a separate narrative section in eGrant for each participating school
 - Targeted
 - Schoolwide (if approved)
 - Not Served



Small District Distribution

- Must still show amount of Title I funds distributed in eGrant School Selection Questions 4 and 5:
 - District-wide activities (Page 4)
 - Each participating school building (Page 5)
 - Private school services (Page 5)



Small Districts low-income student amounts by school area

- Calculate the per low-income student amount to enter into eGrant School Selection page 5
 - Amount Allocated to school DIVIDED BY
 - The total number of resident low-income students attending public and private schools
 - Example \$100,000 for Elementary School divided by 100 public and private school low income students = \$1000 per low-income student

Large Districts more restrictive

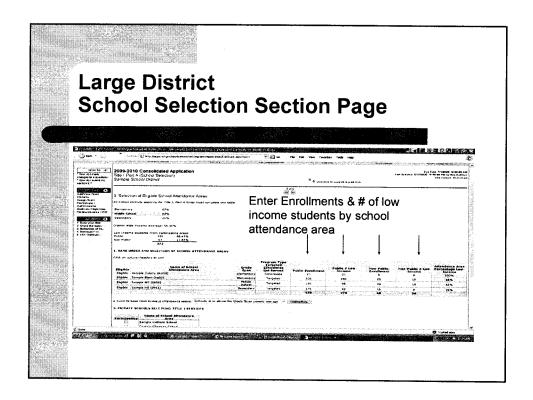
- 1000 or more students enrolled, and
- More than one school per grade span.
- Must follow allocation procedures set out in the Title I law

Large Districts must use the Poverty Measure picked to:

- Rank schools by the percentage (not the number) of low income children counted
- Identify Eligible schools
- Allocate funds to participating public and privates schools.

Large District (School Selection Section Question 3)

- Enter enrollment and low-income student counts for all schools
- Select <u>Schools at or above the District-Wide</u>
 <u>Average</u> from drop down list then click
 Update/Rank button. (May change selection later)



1st Rank all schools based on their percentage of poverty

- Large Districts must rank <u>all</u> public schools from highest to lowest levels of poverty
- Example
 - Elementary A 80%
 - Middle School 75%
 - Elementary B 70%
 - High School 60%

2nd Determine Participating Schools

- Must serve <u>all</u> schools above 75% poverty
 - including middle and high schools.

After all schools above 75% are served

- Continue with the districtwide ranking, or
- Rank schools within grade span groupings
 - Elementary
 - Middle
 - High
 - Change selection on dropdown list to <u>Schools at</u> or above the Grade Span poverty average

Select Eligible Title I Schools

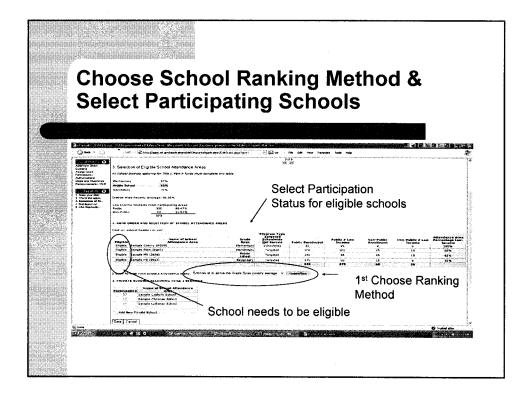
- Determine Eligibility 3 Methods
 - Schools at or above the district wide poverty average or
 - Schools at or above their grade span group poverty average, or
 - Schools with 35% or greater poverty
- Must pick only one and apply consistently across district.

Eligible Schools

- Must designate as eligible in rank order from higher to lower poverty within either the selected district-wide or grade span group
 - Cannot serve a lower poverty school ahead of a higher poverty school with in the selected grouping

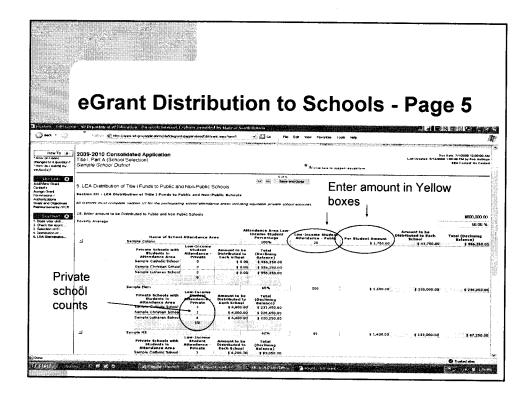
Grandfather Clause

- A School may continue to be served for one year after losing eligibility
- After one year must regain eligibility or cannot be served



Allocation of Funds to Schools

- Allocate to eligible schools in rank order of poverty, from highest to lowest
- A higher poverty school must receive at least as much or more than a lower poverty school.
- If all the schools served are above 35% poverty, the LEA can determine the amount per poverty child as long as it follows the rules above.



Fund Distribution if all schools served are above 35% poverty

- Per-poverty child amounts for each school may be determined by the District
 - Same at all participating schools, or
 - May vary between schools as long as schools with higher poverty receive at least as much or more per-poverty child amount than schools with lower poverty.

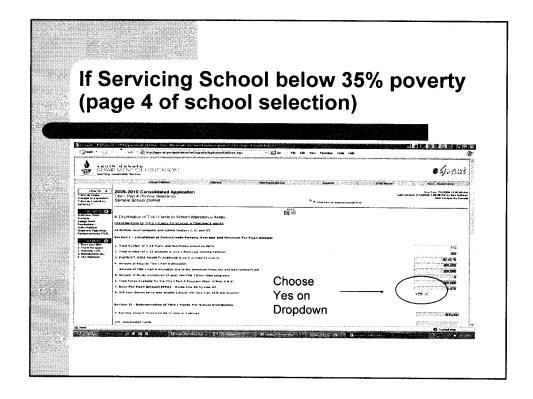
Example - LEA serving only Schools at or above 35% poverty

LEA Poverty Average is 40%

- School A 45% poverty
 - \$800 per poverty student times 50 = \$40,000
- School B 43% poverty
 - \$800 per poverty student times 60 = \$48,000
- School C 41% poverty
 - \$500 per poverty student times 40 = \$20,000
- School D 39% poverty Not Served

Large Districts Serving any School below 35% poverty

- The LEA must determine the minimum per poverty child amount: (School Selection Page 4)
 - Determine the average per poverty child amount Total LEA allocation divided by number of poverty children.
 - Adjust this amount by multiplying by 125%.
- The LEA must calculate this per poverty child amount <u>before</u> it reserves any district level funds.



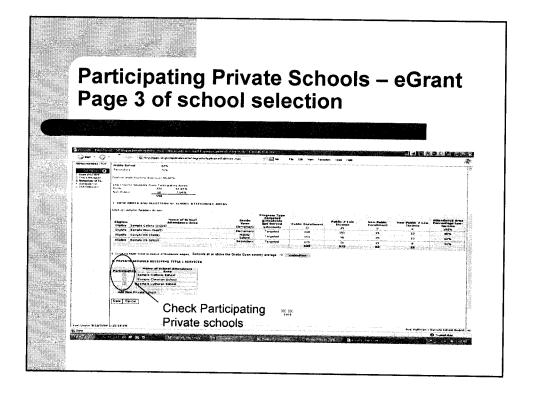
Example if serving schools below 35% Poverty

- LEA Allocation \$100,000
- Total LEA Poverty Students 100
- Per Poverty Child amount \$1000 (\$100,000/100= \$1000)
- 125% of \$1000 equals \$1250
- \$1250 is the minimum per poverty child amount for all schools served.
- Last school service may receive less than 125% amount if sufficient to run a program

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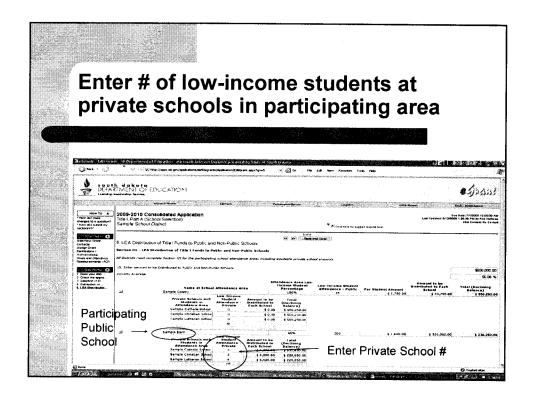
Private School Participation

- Must offer equitable participation to private school students residing in the participating school's attendance area
- Designate participating schools on Page 3 of School Selection



Private School Student Title I Eligibility

- Must reside in a participating public school attendance area
- Equitable amount must be calculated based on a same poverty measure used for ranking
- The resident LEA is responsible for its resident students even if they attend a private school located in another LEA (Title I program only)



Private School Services

- Must be provided by the District, or
- Independent 3rd party contractor
 - May be another LEA
- Do not give funds to private school

All LEAs Private School Equitable Funding

- Example
 - \$100,000 allocated to Adams Elementary School Attendance area
 - \$1000 per low-income student
 - 85 low income students attend Adams \$85,000
 - 15 low income resident elementary students in Adams attendance area at private school
 - \$15,000 in Title I services must be offered to private school students & their teachers

Transferability

- Transferring funds into Title I will increase the District's Title I allocation base amount
- Transferability is a flexibility available to non-REAP LEAs.
 - Do not use if participating in REAP because REAP offers more flexibility
- Allows transferring up to 50% of funds from one program to another.

Affected Programs

- Title I Part A Transfer in only, not out
- Title II Part A- Improving Teacher Quality
- Title II Part D Education Technology (formula grant portion only)
- Title IV Safe and Drug Free Schools

Transferred Funds

- Subject to the requirements of the programs to which they are transferred.
- Accounting wise Tracked back to the original Revenue Source

Steps to Transfer Funds

- Apply on original application, or
- LEA must modify its local plan or application to account for the transfer
- Notify the State at least 30 days before the effective date of the transfer (Won't allow after May 31st)
- Must consult with private schools 1st

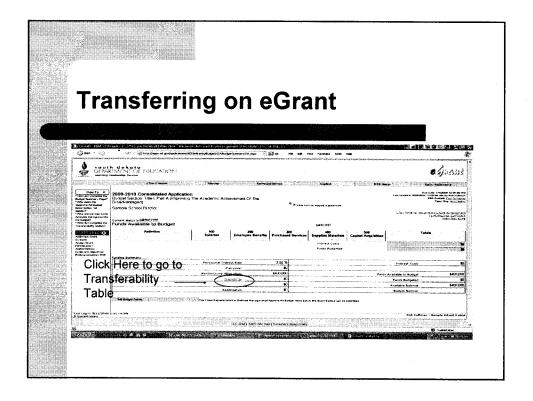
Program Improvement LEAs

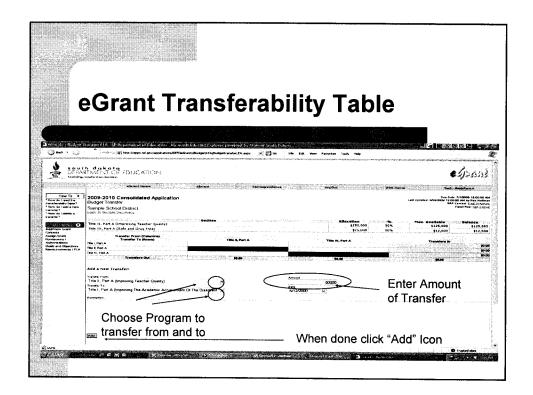
- May transfer not more than 30%
 - Only if the funds are used for District level improvement activities consistent with the Districts Improvement Plan Section 1116 of Title I

Corrective Action LEAs

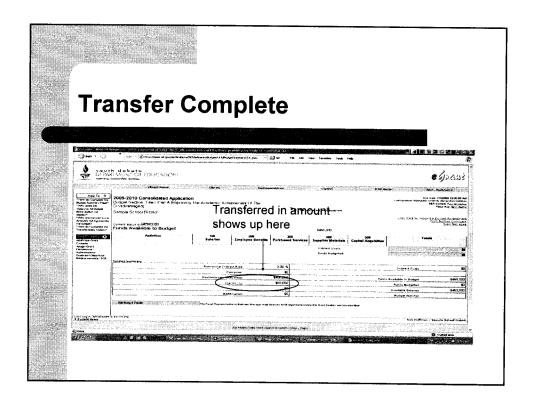
• Prohibited from transferring funds.

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Other District set asides

- Title II Part D Ed Tech
 - At least 25% on professional development
- Title IV Safe and Drug Free
 - 20% cap on security equipment
 - 40% cap on security personnel and equipment

Carryover Period

- Federal Education formula funds are generally available for an initial grant period plus an additional one year carryover period.
- Certain programs are subject to a statutory carryover limit
 - Title I Part A 15%
 - Title IV SDFS 25%

Title I Part A Program Carryovers

- Title I Part A Carryover limit is 15%
 - Applied to Combined Regular & ARRA amount
 - May be eligible for a waiver from State
 - If combined allocation is less than \$50,000 the district is exempt from carryover limit

Rural Education Initiatives

- Alternative Uses of Funds Authority
- Eligible LEAs
 - Average Daily Attendance is less than 600 or,
 - All Counties with schools served by the LEA have a population density of fewer than 10 person per square mile;
 - and a NCES locale code of 7 or 8

REAP Fund Sources

- Title II Part A Improving Teacher Quality
- Title II Part D Ed Tech (formula)
- Title IV Safe and Drug Free Schools

REAP-Flex

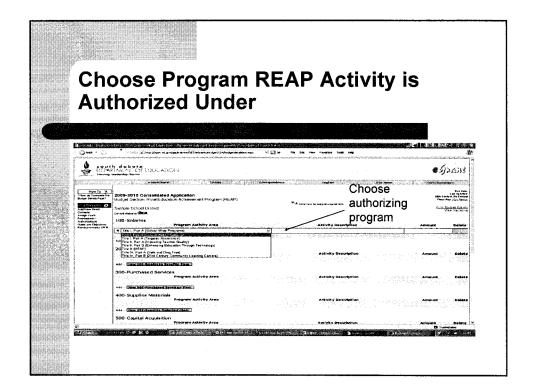
- REAP Flex expands the allowable use of funds authority for each contributing program to include activities authorized by other programs.
- Funds are not transferred to other program.
- Does not affect the base allocation of the Title I program

REAP Allowable Activities

- Any Activities Authorized under:
 - Title I Part A Targeted & Schoolwide
 - Title II Part A Improving Teacher Quality
 - Title II Part D Ed Technology
 - Title III Limited English Proficient
 - Title IV Part A Safe and Drug Free
 - Title IV Part B 21st Century Learning
 - Title V Innovative Programs

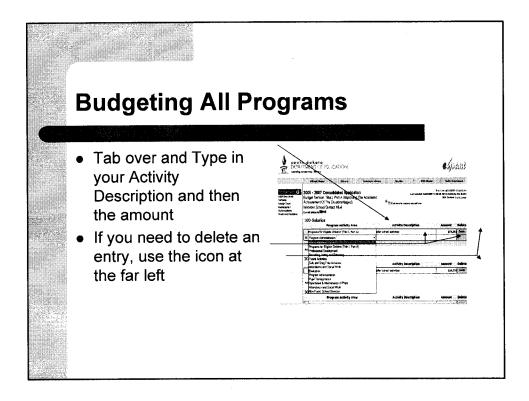
Budgeting REAP on eGrant

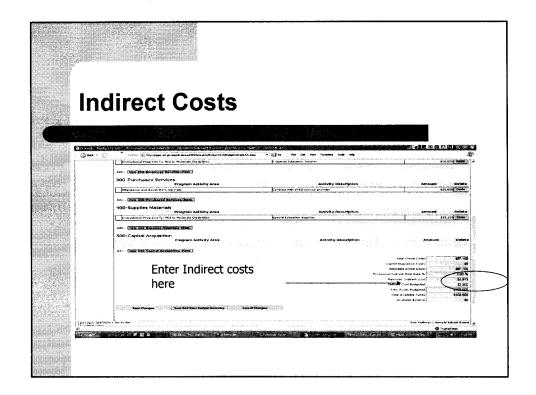
- Go to REAP budget section and choose "edit budget detail at the bottom of page.
- Under each budget object choose the program the activity is authorized under
- This may or may not be the same program that is funding the activity.



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Budget – Personnel costs

- Salaries & Benefits
 - Indicate percent FTE for each category
 - Teachers, paraprofessionals, coaches, administration etc.
- Indicate professional development stipends and # staff receiving them

Budget – Purchased Services

- contracted services
- travel costs
- workshop fees and registration

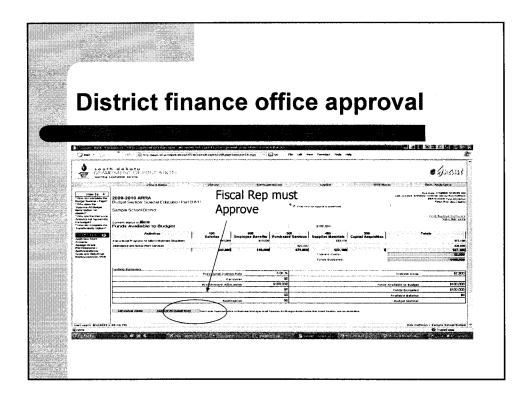
Budget – Supplies & Materials

- Estimate materials and supplies by general category
 - instructional materials
 - Non capitalized equipment
 - Etc.

Budget - Capital Acquisition

- Identify each type of equipment.
- Indicate the estimated per unit cost for each item.

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Application Due Date

- FY 2010 obligations or expenditures are not allowed until the later of the following two dates
 - July 1st, 2009 or
 - The date the State received your application in a substantially approvable form if submitted after July 1, 2009

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Determining Allowable Costs for Federal Programs

- Analyze costs to determine if they are allowable
- Develop a formal process to ensure costs are allowable

Allowable Costs Questions

- Consistent with federal cost principles?
 - OMB Circular A-87 Cost Principles for State, Local & Indian Tribal Governments
- Allowable under the grant program?
- Consistent with the approved application?
- Consistent with program specific fiscal rules?
- Consistent with the needs of the program

Basic A-87 Guidelines

- All Costs Must Be:
 - Necessary
 - Reasonable
 - Allocable
 - Authorized or not prohibited under state and local law

Necessary

- Must be necessary for the performance or administration of the grant
- Questioning "necessary"
 - Do we really need this?
 - Do we already have existing resources sufficient for this purpose?

Reasonable Costs

- Must follow sound business practices:
 - · Arms length bargaining
 - Follow federal, state and local laws
 - Follow terms of the grant award
- Market prices for comparable goods or services
- No significant deviation from established practices of the grantee

Questions - Reasonable

- Is the expense targeted to a legitimate program activity?
- Do we have the capacity to use what we are purchasing?
- Can we prove that we paid a fair rate?
- Would I be comfortable defending this purchase?

Allocable

- Can only charge in proportion to the value received by the program
- Example: The district purchases a computer to use 50% in the Title I program and 50% in a state program – can only charge half the cost to Title I

Questions - Allocable

- Can I prove the program benefited?
- Can I prove other programs are not the primarily beneficiary?
 - Ensure only authorized use
 - Incidental benefit is okay

Other Basic Guidelines

- Legal under state and local law
 - If not legal under state law, cannot pay with federal funds
- Conform with federal law & grant terms

Adequate Documentation

- Lack of Documentation is #1 Audit Finding
 Document the following
- Amount of funds under grant
- How the funds are used
- Total cost of the project
- Share of costs provided by other sources

Adequate Documentation

- Records that show compliance
- Records that show performance
- Other records to facilitate an effective audit
- Keep at least 5 years after the final project completion report is submitted (Statute of Limitations)
 - Longer if unresolved audit issues

Support Documentation

Sufficient to determine the nature of the expenditures and their allowability:

- Cancelled checks;
- Vouchers with supporting invoices;
- Payroll records; Contracts;
- Time and attendance records

Accountability & ARRA

- Quarterly Reports for Performance & Spending
- US Dept. of Ed will monitor LEAs and SEAs ARRA expenditures
- There will also be a 1 800 number to report misuse of funds nationally

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